

JAMES BOPP, JR.¹

Senior Associates

RICHARD E. COLESON¹

BARRY A. BOSTROM¹

Associates

RAEANNA S. MOORE¹

JEFFREY P. GALLANT²

ANITA Y. WOUDEBERG¹

Of Counsel

THOMAS J. MARZEN³

¹admitted in Ind. only

²admitted in Va. only

³admitted in Ill. only

BOPP, COLESON & BOSTROM 10:11

ATTORNEYS AT LAW

(not a partnership)

1 South Sixth Street

TERRE HAUTE, INDIANA 47807-3510

Telephone 812/232-2434 Facsimile 812/235-3685

E-MAIL ADDRESSES

jboppjr@aol.com

rcoleson@bopplaw.com

bbostrom@bopplaw.com

rmoore@bopplaw.com

jgallant@bopplaw.com

awoudeberg@bopplaw.com

tmarzen@bopplaw.com

November 15, 2004

Indiana Recount Commission
302 W. Washington St., Rm E-204
Indianapolis, IN 46204-2767

Re: Kip Tew, in his capacity as Chairman
of the Indiana State Democratic Cen-
tral Committee v. Mike Sodrel, Baron
Hill and Al Cox

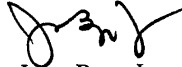
Dear Commission Members:

This letter confirms that James Bopp, Jr., Barry A. Bostrom and Raeanna S. Moore of the firm Bopp, Coleson & Bostrom represent Mike Sodrel in the above referenced recount and contest.

Thank you.

Sincerely,

BOPP, COLESON & BOSTROM



James Bopp, Jr.

Barry A. Bostrom

Raeanna S. Moore

cc: William R. Groth
Al Cox

RECEIVED
BEFORE THE INDIANA RECOUNT COMMISSION
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IN THE MATTER OF THE RECOUNT)
AND CONTEST FOR THE ELECTION)
OF UNITED STATES REPRESENTATIVE,)
DISTRICT 9,)
KIP TEW, in his capacity as Chairman of the)
Indiana State Democratic Central Committee,)
Petitioner,)
vs.)
MIKE SODREL, BARON HILL, and)
AL COX,)
Respondents.)

CROSS-PETITION FOR CONTEST

Respondent/Cross-Petitioner, Mike Sodrel, for his Cross-Petition for contest states as follows:

1. Respondent/Cross-Petitioner was the Republican candidate for U.S. Representative in District 9 and is entitled to contest pursuant to Indiana Code § 3-12-11-1 *et seq.*
2. The office that is the subject of Respondent/Cross-Petitioner's contest is U.S. Representative in District 9.
3. The name of the candidates, as set forth on the November 2, 2004, ballot, and the address of each candidate, as set forth in the records of the election division, are as follows:

Mike Sodrel, Republican
3008 E. Lobo Ridge Drive
New Albany, IN 47150

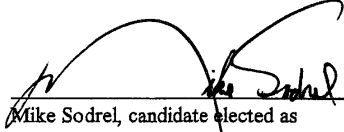
Baron Hill, Democrat
1136 Kensington Court
Seymour, IN 47274

Al Cox, Libertarian
370 Daugherty Road
Nashville, IN 47448

4. Respondent/Cross-Petitioner in good faith believes that a deliberate act or series of acts occurred in Monroe County making it impossible to determine the candidate who received the highest number of votes cast in the election for U.S. Representative, District 9, in Monroe County.
5. On information and belief, a substantial number of ineligible persons may have voted in all precincts in Monroe County. Respondent/Cross-Petitioner's belief is based in part on a number of mailings sent to newly registered voters, independents and others who had not voted in a primary that were returned to the Monroe County Republican Party, marked "not deliverable as addressed, unable to forward," "no such street number" and other similar United States postal service markings indicating that the alleged voter does not reside at that address.

WHEREFORE, Respondent/Cross-Petitioner prays that the Indiana Recount Commission initiate contest proceedings in Monroe County for the U.S. Representative District 9 race and take appropriate steps to determine whether the number of ineligible persons who were allowed to vote in Monroe County was so pervasive that it is impossible to determine the appropriate number of votes that each candidate received in all precincts in Monroe County.

Respectfully submitted,

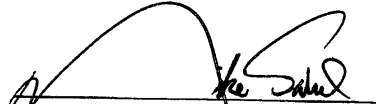
A handwritten signature in black ink, appearing to read "Mike Sodrel", is written over a horizontal line.

Mike Sodrel, candidate elected as
U.S. Representative, Indiana District 9

A handwritten signature in black ink, appearing to read "James Bopp, Jr.", is written over a horizontal line.

James Bopp, Jr., No. 2838-84
Barry A. Bostrom, No. 11912-84
Raeanna S. Moore, No. 20277-84
BOPP, COLESON & BOSTROM
1 S. Sixth Street
Terre Haute, IN 47807
(812) 232-2434 voice
(812) 235-3685 fax
Attorneys for Respondent Mike Sodrel

I, Mike Sodrel, do hereby affirm, under penalties for perjury, that the foregoing representations
are true.



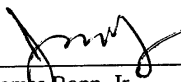
Mike Sodrel, candidate elected as
U.S. Representative, Indiana District 9

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 16, 2004, a true and complete copy of the foregoing was served upon the following persons in person and by depositing a copy of the same in the United States Mail, first class, postage prepaid, at the following address:

William R. Groth
Geoffrey S. Lohman
FILLINWARTH DENNERLINE GROTH & TOWE
1213 North Arlington Ave., Suite 204
Indianapolis, IN 46219

Al Cox
370 Daugherty Road
Nashville, IN 47448



James Bopp, Jr.